

Bank of America Building
18305 Biscayne Blvd., Suite 214
Aventura, Florida 33160

June 24, 2020

VIA CM/ECF

Honorable Judge John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 14A
New York, NY 10007-1312

Counsel fails to note that on the last requested stay, the Court noted that no further stays would be granted "except for exceptional good cause." No such good cause is shown. All discovery is to be completed by August 28, 2020. Any dispositive motions are to be filed by September 18, 2020. A joint pretrial order is to be filed by October 9, 2020. The parties shall be ready for trial on 48 hours' notice on October 23, 2020.

New York, NY
June 25, 2020

/s/ John G. Koeltl
John G. Koeltl
U.S.D.J.

Re: Norris v. Keste Group LLC, et al.
Case No.: 1:19-cv-07568-JGK

Dear Judge Koeltl:

The undersigned represents the Plaintiff in the above-captioned case matter.

Due to the continuing national health crisis caused by the COVID-19 pandemic, the diminished economic effects it is causing public businesses such as the business in this case, including complete closures, the undersigned does not believe it is in the best interest of the parties nor the proper time, and a potential waste of resources and time to move forward, until the defendant businesses are back on their feet and generating a real income, so to be able to move forward through the litigation processes, including discovery.

Therefore, Plaintiff's undersigned counsel again hereby respectfully requests that the Court grant an additional thirty (30) day stay of all deadlines and/or any Conference in this matter. The undersigned has conferred with opposing counsel who consent to this request.

The Court may wish to note that this is undersigned counsel's fourth request to stay this matter. Thank you for your consideration of this unfortunate, but necessary additional request.

Sincerely,

By: /S/ B. Bradley Weitz
B. Bradley Weitz, Esq. (BW 9365)
THE WEITZ LAW FIRM, P.A.
18305 Biscayne Blvd., Suite 214
Aventura, Florida 33160
Tel.: (305) 949-7777
Fax: (305) 704-3877
Email: bbw@weitzfirm.com